

## STATE OF SOUTH CAROLINA

## (Caption of Case)

Combined Application of South Carolina Electric & Gas Co. for a Certificate of Environmental Compatibility and Public Convenience and Necessity and for a Base Load Review Order for the Construction and Operation of a Nuclear Facility at Jenkinsville, SC

193722  
ORIGINAL  
JUL 03 2008  
RECEIVE

BEFORE THE  
PUBLIC SERVICE COMMISSION  
OF SOUTH CAROLINA

## COVER SHEET

## DOCKET

NUMBER: 2008 - 196 - E

#2 10/27/08 10:30

(Please type or print)

Submitted by: Scott ElliottSC Bar Number: 1872Address: 721 Olive StreetTelephone: 803-771-0555Columbia, SC 29205Fax: 803-771-8010

Other: \_\_\_\_\_

Email: sellott@elliottlaw.us

NOTE: The cover sheet and information contained herein neither replaces nor supplements the filing and service of pleadings or other papers as required by law. This form is required for use by the Public Service Commission of South Carolina for the purpose of docketing and must be filled out completely.

## DOCKETING INFORMATION (Check all that apply)

☐ Emergency Relief demanded in petition ☐ Request for item to be placed on Commission's Agenda expeditiously

☐ Other: \_\_\_\_\_

## INDUSTRY (Check one)

## NATURE OF ACTION (Check all that apply)

☒ Electric☐ Affidavit☐ Letter☐ Request☐ Electric/Gas☐ Agreement☐ Memorandum☐ Request for Certificatio☐ Electric/Telecommunications☐ Answer☐ Motion☐ Request for Investigator☐ Electric/Water☐ Appellate Review☐ Objection☐ Resale Agreement☐ Electric/Water/Telecom.☐ Application☐ Petition☐ Resale Amendment☐ Electric/Water/Sewer☐ Brief☐ Petition for Reconsideration☐ Reservation Letter☐ Gas☐ Certificate☐ Petition for Rulemaking☐ Response☐ Railroad☐ Comments☐ Petition for Rule to Show Cause☐ Response to Discovery☐ Sewer☐ Complaint☒ Petition to Intervene☐ Return to Petition☐ Telecommunications☐ Consent Order☐ Petition to Intervene Out of Time☐ Stipulation☐ Transportation☐ Discovery☐ Prefiled Testimony☐ Subpoena☐ Water☐ Exhibit☐ Promotion☐ Tariff☐ Water/Sewer☐ Expedited Consideration☐ Proposed Order☐ Other:☐ Administrative Matter☐ Interconnection Agreement☐ Protest☐ Other:☐ Interconnection Amendment☐ Publisher's Affidavit☐ Late-Filed Exhibit☐ Report

OK D. Duke  
OK D. Duke

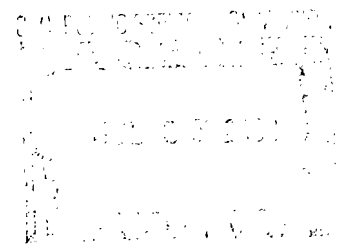
ELLIOTT & ELLIOTT, P.A.  
ATTORNEYS AT LAW  
721 OLIVE STREET  
COLUMBIA, SOUTH CAROLINA 29205  
[selliott@elliottlaw.us](mailto:selliott@elliottlaw.us)

SCOTT ELLIOTT

TELEPHONE (803) 771-0555  
FACSIMILE (803) 771-8010

July 1, 2008


Mr. Charles L.A. Terreni  
Chief Clerk of the Commission  
SC Public Service Commission  
P. O. Drawer 11649  
Columbia, SC 29211



RE: Combined Application of South Carolina Electric & Gas Company for a  
Certificate of Environmental Compatibility and Public Convenience and  
Necessity and for a Base Load Review Order for the Construction and  
Operation of a Nuclear Facility at Jenkinsville, South Carolina  
Docket No. 2008-196-E

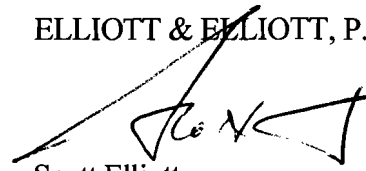
Dear Mr. Terreni:

Enclosed please find for filing an original and ten (10) copies of the Petition to Intervene of the South Carolina Energy Users Committee ("SCEUC") in the above-captioned matter. By copy of this letter, I am serving all parties of record.

 I have enclosed an extra copy of this petition which I would ask you to date stamp and return to me in the stamped self-addressed envelope enclosed for your convenience. If you have questions, please do not hesitate to contact me.

Sincerely,

ELLIOTT & ELLIOTT, P.A.



Scott Elliott

SE/jcl

Enclosures

cc: All parties of record (w/Encl.)

**DOCKET NO. 2008-196-E**

U.S. PUBLIC SERVICE COMMISSION  
RECEIVED  
JUL 03 2008  
RECEIVED

IN THE MATTER OF: )  
 )  
South Carolina Electric & Gas Company )  
Combined Application for Certificate )  
of Environmental Compatibility and )  
and Public Convenience and Necessity and )  
for a Base Load Review Order )

## PETITION TO INTERVENE

The South Carolina Energy Users Committee (“SCEUC”) hereby petitions the South Carolina Public Service Commission (“Commission”) pursuant to R.103-825 of the Commission’s rules and regulations to intervene and be made a party of record in the above-captioned docket. In support of this Petition, SCEUC would allege as follows:

1. That the South Carolina Electric & Gas Company (“SCE&G” or “Utility”) alleges in the Application, inter alia, that it plans to construct two nuclear generating units, namely, AP1000 Advanced Passive Safety Power Plants (“AP1000”), located near Jenkinsville, South Carolina, approximately one (1) mile from Summer Station Unit 1; that according to the Application, the AP1000 units, identified in the Application as Unit 2 and Unit 3, and associated facilities will be jointly owned by SCE&G and the South Carolina Public Service Authority; that the Utility alleges that the AP1000 units and associated facilities will be constructed by a consortium consisting of Westinghouse Electric Company, LLC and Stone & Webster, Inc.; and that SCE&G alleges that AP1000 Unit 2 and Unit 3 will become operational in 2016 and 2019, respectively.

3. That a number of members of SCEUC purchase and consume substantial amounts of electricity from SCE&G.

4. That SCEUC and its members have a direct and material interest in the issues to be addressed and resolved by the Commission in this docket and the interests of its members are not adequately represented by the current parties to this proceeding.

5. That given the state of the record at this stage of the proceedings, SCEUC lacks sufficient information to fully develop and state its position in this proceeding at this time.

6. That granting SCEUC's request to be made a party of record in this proceeding is in the public interest, is consistent with the policies of the Commission in encouraging maximum public participation in issues before it, and should be allowed so that a full and complete record addressing its views and concerns can be developed.

7. That in accordance with Rule R. 103-804 (S) of the Commission's Rules of Practice and Procedure, Petitioner is represented by counsel in this proceeding:

Scott Elliott, Esquire  
Elliott & Elliott, P.A.  
721 Olive Street  
Columbia, South Carolina 29205  
Telephone: 803-771-0555  
Fax: 803-771-8010  
sellott@elliottlaw.us

WHEREFORE, Petitioner prays for the following relief:

- a. That this Petition to Intervene be accepted and that Petitioner be made a party of record;
- b. That Petitioner be allowed to participate fully in this proceeding and take such positions as it deems advisable;

- c. That the Petitioner be served with all responses to data requests or other discovery heretofore served upon any party or to be served upon any other party; and
- d. For such other and further relief as is just and proper.

P3



---

Scott Elliott, Esquire  
ELLIOTT & ELLIOTT, P.A.  
721 Olive Street  
Columbia, S.C. 29205  
(803) 771-0555

Attorney for the South Carolina Energy  
Users Committee

Columbia, South Carolina  
July 1, 2008

## CERTIFICATE OF SERVICE

The undersigned employee of Elliott & Elliott, P.A. does hereby certify that (s)he has served below listed parties with a copy of the pleading(s) indicated below by mailing a copy of same to them in the United States mail, by regular mail, with sufficient postage affixed thereto and return address clearly marked on the date indicated below:

RE: Combined Application of South Carolina Electric & Gas Company for a Certificate of Environmental Compatibility and Public Convenience and Necessity and for a Base Load Review Order for the Construction and Operation of a Nuclear Facility at Jenkinsville, South Carolina  
Docket No. 2008-196-E

PARTIES SERVED: Belton T. Zeigler, Esquire  
Pope Zeigler, LLC  
P. O. Box 11509  
Columbia, SC 29211

Nanette S. Edwards, Esquire  
Office of Regulatory Staff  
1441 Main Street, Suite 300  
Columbia, SC 29201

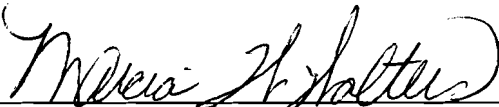
Shannon Bowyer Hudson, Esquire  
Office of Regulatory Staff  
1441 Main Street, Suite 300  
Columbia, SC 29201

K. Chad Burgess, Esquire  
Willoughby & Hoefer, P.A.  
1426 Main Street,  
Mail Code 130  
Columbia, SC 29201

Mitchell Willoughby, Esquire  
Willoughby & Hoefer, P.A.  
PO Box 8416  
Columbia, SC 29202

PLEADING: PETITION TO INTERVENE BY SOUTH CAROLINA  
ENERGY USERS COMMITTEE

July 1, 2008

  
\_\_\_\_\_  
Marcia W. Walters, Legal Assistant

